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April 5, 2019

**VIA ECF**

The Hon. James Orenstein  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Michael Grecco Prods., Inc. v. Alamy Inc., Case No. 18 Civ. 03260 (PKC) (JO)

Dear Judge Orenstein:

This firm represents defendant Alamy, Inc. ("Alamy") in the above-captioned action. We write pursuant to Rule II.A of Your Honor's Individual Practices to respectfully request an adjournment of the discovery planning conference, which is currently scheduled for April 9, 2019 at 11:00 a.m.

This is the second request for an adjournment or extension of time in this matter. Alamy previously requested an extension of time to answer, move, or otherwise respond to plaintiff Michael Grecco Productions, Inc. ("MGP") Complaint (Dkt. No. 12) and such request was granted.

MGP, through its counsel, consents to the requested adjournment. The earliest date on which both parties' counsel are available to appear for a discovery planning conference is Wednesday, April 17, 2019.

Granting this extension will affect the parties' joint proposed discovery plan, which is currently due today, April 5, 2019. Alamy respectfully requests, and MGP consents, that this deadline be correspondingly extended until two business days prior to the discovery planning conference. No other dates will be affected by granting this extension, as no other dates have yet been set by the Court.

We thank the Court for its attention to this matter.

Respectfully submitted,

*Nancy E Wolff / MBL*

Nancy E. Wolff  
NEW:mbi

cc: All Counsel of Record (via ECF)